

Exhibit 1

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[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GERARDO ACEVES, THOMAS FAN,
EDWIN MARTINEZ, TIFFANY SMOOT,
EDOUARD CORDI, and BRETT
MAGGARD, Individually, and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., COINBASE,
INC., COINBASE ASSET MANAGEMENT,
LLC, and BRIAN ARMSTRONG,

Defendants.

MOLLIJOY CARTER, BRADLEY
BARNES, and ANTONETT FOY,
Individually and on behalf of all others
similarly situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., COINBASE,
INC., COINBASE ASSET MANAGEMENT,
LLC, and BRIAN ARMSTRONG,

Defendants.

Case No. 3:24-cv-02663-MMC

**STIPULATION REGARDING
ADMINISTRATIVE MOTION TO
RELATE CASES**

CLASS ACTION

Judge: Maxine M. Chesney

Case No. 3:24-cv-03350-CRB

CLASS ACTION

Judge: Charles R. Breyer

1 WHEREAS, Plaintiffs in the action entitled *Aceves, et al. v. Coinbase Global, Inc., et al.*,
2 Case No. 3:24-cv-02663-MMC (N.D. Cal.) (the “*Aceves Action*”) filed their complaint on May
3 3, 2024;

4 WHEREAS, Plaintiffs in the action entitled *Carter, et al. v. Coinbase Global, Inc., et al.*,
5 Case No. 3:24-cv-03350-CRB (N.D. Cal.) (the “*Carter Action*”) filed their complaint on June 4,
6 2024;

7 WHEREAS, the parties believe that the two above-referenced actions should be deemed
8 “related” pursuant to Civil L.R. 3-12(a), as set forth in this stipulation because: (a) the above-
9 captioned actions concern substantially the same parties, property, transactions, or events; and (b)
10 it appears likely that there will be an unduly burdensome duplication of labor and expense or
11 conflicting results if the cases are conducted before different Judges;¹

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties
13 hereto, through their undersigned counsel, that the Court order as follows:

- 14 1. The *Aceves Action* and *Carter Action* shall be deemed related because:
- 15 a. the actions concern substantially the same parties, property, transaction or event;
16 and
17 b. it appears likely that there will be an unduly burdensome duplication of labor
18 and expense or conflicting results if the cases are conducted before different
19 Judges.

20 **IT IS SO STIPULATED.**
21
22
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26 _____
27 ¹ For the avoidance of doubt, by agreeing to this stipulation, Defendants do not waive
28 and affirmatively preserve all defenses to the complaint in either Action that they may assert at
the appropriate time.

1
2 Dated: July 9, 2024

3
4 **SCOTT+SCOTT ATTORNEYS AT
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*Admission pro hac vice application
forthcoming

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Attestation Pursuant to Local Rule 5-1(i)(3)

Pursuant to Civil L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: July 9, 2024

/s/ Mark R. S. Foster
Mark R. S. Foster